

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)

) Case No. 25-10068 (CTG)  
)

) (Jointly Administered)  
)

) **Hearing Date: August 14, 2025 at 10:00 a.m. (ET)**  
)

) **Response Deadline: July 21, 2025 at 4:00 p.m. (ET)**  
)

**NOTICE OF DEBTORS' ELEVENTH OMNIBUS  
OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)  
(Reclassified Claims)**

***TO ALL PARTIES RECEIVING THIS OBJECTION:***

**YOU SHOULD REVIEW EXHIBIT 1 TO THE PROPOSED ORDER TO LOCATE YOUR NAME AND CLAIM(S) AND DETERMINE IF YOUR CLAIM(S) ARE SUBJECT TO THIS OBJECTION. IF YOUR CLAIM(S) ARE LISTED ON THE EXHIBIT ATTACHED TO THE PROPOSED ORDER, YOU MAY HAVE SUBSTANTIVE RIGHTS AFFECTED BY THIS OBJECTION.**

**YOUR SUBSTANTIVE RIGHTS MAY ALSO BE AFFECTED BY FURTHER OBJECTIONS THAT MAY BE FILED IN THESE CHAPTER 11 CASES.**

**THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE DEBTORS, THEIR ESTATES, ANY SUCCESSORS THERETO OR ANY OTHER PARTY IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION, AND NOTHING HEREIN OR THE PROPOSED ORDER IS INTENDED OR SHALL BE DEEMED TO BE AN ALLOWANCE OF ANY SUCH CLAIMS.**

**PLEASE TAKE NOTICE** that on June 30, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) have filed the attached *Debtors’ Eleventh Omnibus Objection to Certain Claims (Substantive)* (the “Objection”).<sup>2</sup>

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

**PLEASE TAKE FURTHER NOTICE** that any responses (each, a “Response”) to the relief requested in the Objection must be filed on or before **4:00 p.m. (prevailing Eastern Time) on July 21, 2025 (the “Response Deadline”)** with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”). At the same time, any party submitting a Response (each, a “Respondent”) must serve a copy of its Response upon the undersigned counsel to the Debtors so as to be received on or before the Response Deadline.

**PLEASE TAKE FURTHER NOTICE** that any Response must contain, at a minimum, the following:

- a) a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;
- b) the name of the claimant and description of the basis for the amount of the Reclassified Claim;
- c) a concise statement setting forth the reasons why a particular Reclassified Claim should not be reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that the hearing to consider the objection will be held on **August 14, 2025 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Court Judge for the District of Delaware, 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR A HEARING.**

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<sup>2</sup> Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

Dated: June 30, 2025  
Wilmington, Delaware

*/s/ Michael E. Fitzpatrick*

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**COLE SCHOTZ P.C.**

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